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Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

CYNTHIA E. RHOADES,

Case No. 3:18-cv-00123-SB

Plaintiff,

vs.

**STATE OF OREGON DEPARTMENT OF
JUSTICE,**

**DECLARATION OF COUNSEL
IN SUPPORT OF PLAINTIFF'S MOTION
FOR EXTENSION OF TIME TO
RESPOND TO PARTIAL MOTION TO
DISMISS**

Defendant.

I, Laura Koistinen, declare as follows:

1. I am counsel for plaintiff in the above-referenced case.
2. Plaintiff moves for an order extending the current deadline to file a response in opposition to Defendant's Motion to Dismiss (Dkt. No. 23) by 7 days to September 21, 2018.
3. Lead counsel, Beth Creighton's husband was recently diagnosed with stage 3 and is starting an intense course of chemotherapy and radiation tomorrow.
4. Ms. Creighton has been out of the office frequently in the time since the service of the motion to dismiss to care for her husband and attend doctor's consultations and hospital visits.

5. Ms. Creighton had planned to draft the response to defendant's motion to dismiss but is no longer able to given the circumstances. She asked that I draft a response to the motion to dismiss today.

6. To properly respond to defendant's motion, I need an extra week to review the case and case law.

7. I have conferred with defense counsel, who opposes this motion.

8. I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED this 11th day of September, 2018.

CREIGHTON & ROSE, PC

s/Laura Koistinen

LAURA KOISTINEN, OSB#175123

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Of Attorneys for Plaintiff